

**NOTICE OF AMENDMENT
AND
WARNING LETTER**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 20, 1997

Mr. E. Jack Ralph
Vice President of Operations
Texas Gas Transmission Corporation
3800 Frederica St.
P.O. Box 20008
Owensboro, KY 42304

CPF No. 37117M

Dear Mr. Ralph:

On September 8-12 and September 15-19, 1997, a representative of the Central Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Texas Gas Transmission's facilities in Bedford, Wilfred, Dillsboro, Petersburg, and Oaktown, IN.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and the probable violations are:

1. § 192.605(b) Procedural Manual for Operations, Maintenance, and Emergencies

Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and emergency response.

The review of the Company's O&M manual revealed that the manual did not address the following items:

- 1) The O&M manual did not have procedures for conducting performance tests of the gas detection devices in the compressor stations as required by §192.736(c). However, review of the records show that these tests are done annually.
- 2) The O&M manual did not indicate in the welding procedures the limitation on welders (6 month interval) as defined by §192.229(b). Records show that a full API 1104 multiple qualification destructive test is done every year and an x-ray of a production weld is done in the 6 month interval between the destructive tests.

2) §192.603(b)- Operations

Each operator shall keep records necessary to administer procedures established under §192.605.

While reviewing patrolling records, several exposures were noted where no facility condition report was made as required by §192.459. No documentation was done on the evaluation of a transmission line when it was first found exposed. The condition of the line was reported to be evaluated when it was found, but not documented. The evaluation should be documented to show compliance with this requirement.

Under 49 United States Code § 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

In regard to item two (2), we have reviewed the circumstances and supporting documents involved in this case, and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations, we will take enforcement action when and if the continued violations come to our attention.

With regard to item one (1), when it is found that an operator's procedures are inadequate, 49 C.F.R. § 190.237 provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures and the response options as prescribed under § 190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify

the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within ninety (90) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety